

1 Thomas B. Mayhew (State Bar No. 183539)
2 tmayhew@fbm.com
3 Claire Johnson (State Bar No. 305141)
4 cjohnson@fbm.com
5 FARELLA BRAUN + MARTEL LLP
6 235 Montgomery Street, 17th Floor
7 San Francisco, CA 94104
8 Telephone: (415) 954-4400
9 Facsimile: (415) 954-4480

10 Attorneys for Defendants
11 VALEANT PHARMACEUTICALS
12 INTERNATIONAL, INC. AND VALEANT
13 PHARMACEUTICALS NORTH AMERICA,
14 LLC

15 L. Timothy Fisher (State Bar No. 191626)
16 ltfisher@bursor.com
17 Joel D. Smith (State Bar No. 244902)
18 jsmith@bursor.com
19 Yeremey Krivoshey (State Bar No. 295032)
20 ykrivoshey@bursor.com
21 BURSOR & FISHER, P.A.
22 1990 North California Blvd., Suite 940
23 Walnut Creek, CA 94596
24 Telephone: (925) 300-4455
25 Facsimile: (925) 407-2700

26 Scott A. Bursor (State Bar No. 276006)
27 scott@bursor.com
28 BURSOR & FISHER, P.A.
29 888 Seventh Avenue
30 New York, NY 10019
31 Telephone: (212) 989-9113
32 Facsimile: (212) 989-9163

33 Attorneys for Plaintiffs
34 CHRISTINA LABAJO AND MARY YOON,
35 on behalf of themselves and all others
36 similarly situated

37 UNITED STATES DISTRICT COURT
38 CENTRAL DISTRICT OF CALIFORNIA

39 CHRISTINA LABAJO and MARY
40 YOON, on behalf of themselves and all
41 others similarly situated,

42 Plaintiffs,

43 Case No. 5:17-cv-00412-AB-DTB

44 STIPULATION EXTENDING
45 TIME TO RESPOND TO INITIAL
46 COMPLAINT

47 STIPULATION RE MOTION TO DISMISS
48 BRIEFING
49 CASE NO. 5:17-CV-00412-AB-DTB

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2 vs.
3 VALEANT PHARMACEUTICALS
4 INTERNATIONAL, INC. AND
5 VALEANT PHARMACEUTICALS
6 NORTH AMERICA, LLC,
7 Defendants.

[L.R. 8-3]

Complaint served: March 15, 2017
Current response date: April 26, 2017
New response date: May 3, 2017

7 Plaintiffs Christina Labajo and Mary Yoon, and Defendants Valeant
8 Pharmaceuticals International, Inc. and Valeant Pharmaceuticals North America,
9 LLC, stipulate and agree as follows:

10 WHEREAS, Plaintiffs served their Complaint on March 15, 2017, and
11 Defendants' response to Plaintiffs' Complaint is currently due on April 26, 2017;

12 WHEREAS, pursuant to L.R. 8-3, the parties have agreed to extend
13 Defendants' time to respond to the Complaint to May 3, 2017;

14 WHEREAS, Defendants intend to file a motion to dismiss for lack of
15 subject-matter jurisdiction, which they contend will dispose of this matter in its
16 entirety;

17 WHEREAS, to accommodate counsels' schedules and ensure adequate time
18 for briefing on Defendants' anticipated motion, the parties have agreed to a briefing
19 schedule on the anticipated motion;

20 NOW, THEREFORE, THE PARTIES HEREBY AGREE AND
21 STIPULATE AS FOLLOWS:

22 1. Defendants shall file their motion to dismiss on or before May 3, 2017;
23 2. Plaintiffs shall file their opposition to the motion to dismiss on or
24 before May 30, 2017; and
25 3. Defendants shall file their reply on or before June 5, 2017.

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STIPULATION RE MOTION TO DISMISS
BRIEFING
CASE NO. 5:17-CV-00412-AB-DTB

1 4. The hearing on the motion will be on Monday, June 19, 2017, at 10:00
2 a.m., or as soon thereafter as the Court may allow.
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5 **IT IS SO STIPULATED.**

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7 Dated: April 26, 2017

FARELLA BRAUN + MARTEL LLP

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9 By: /s/ Thomas Mayhew
10 Thomas Mayhew

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12 Attorneys for Defendants
13 VALEANT PHARMACEUTICALS
14 INTERNATIONAL, INC. and
15 VALEANT PHARMACEUTICALS
16 NORTH AMERICA, LLC

17
18 Dated: April 26, 2017

BURSOR & FISHER, P.A.

19
20 By: /s/ Joel Smith
21 Joel D. Smith

22
23 Attorneys for Plaintiffs
24 CHRISTINA LABAJO and MARY
25 YOON

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27 **Signature Attestation**

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30 Pursuant to Civil Local Rule 5-4.3.4(i), I hereby attest that all other
31 signatories listed, whose signatures are indicated by a conformed signature ("s/"),
32 and on whose behalf the filing is submitted, concur in the filing's content and have
33 authorized the filing.

1 Dated: April 26, 2017

FARELLA BRAUN + MARTEL LLP

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By: /s/ Thomas Mayhew
Thomas Mayhew

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Attorneys for Defendants
VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. and
VALEANT PHARMACEUTICALS
NORTH AMERICA, LLC

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